

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JEROD TERRELL PEPPERS,
DOMONIQUE OCTVIA BYERS,
SETH ALAN PLUMMER, and
JUSTIANA FRISON

INDICTMENT

Case No. _____

Violation: 21 U.S.C. § 846

**Conspiracy to Possess with Intent to Distribute
and Distribute a Controlled Substance**

The Grand Jury Charges:

From in or about January 1, 2024, through the date of this Indictment, in the Districts of North Dakota, Minnesota, and elsewhere,

JEROD TERRELL PEPPERS,
DOMONIQUE OCTVIA BYERS,
SETH ALAN PLUMMER, and
JUSTIANA FRISON

did knowingly and intentionally combine, conspire, confederate, and agree together and with others, both known and unknown to the grand jury, to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of fentanyl,¹ a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi), and Title 18, United States Code, Section 2.

¹ 21 U.S.C. § 841(b)(1)(A)(vi): The chemical structure of fentanyl is N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide.

Drug Quantity Finding

The grand jury specifically finds that as to defendants JEROD TERRELL PEPPERS, DOMONIQUE OCTVIA BYERS, and SETH ALAN PLUMMER, this conspiracy involved more than 400 grams of a mixture and substance containing fentanyl, a Schedule II controlled substance, as provided in 21 U.S.C. § 841(b)(1)(A)(vi). These amounts are attributable to the defendants as a result of their conduct and the conduct of other co-conspirators that was reasonably foreseeable to them.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others did possess with intent to distribute and distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, within the states of North Dakota, Minnesota, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
3. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities;
4. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

In violation of Title 21, United States Code, Section 846, and Pinkerton v. United States, 328 U.S. 640 (1946).

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER

United States Attorney

BMS/js